IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

VIRTUAL CREATIVE ARTISTS, LLC,

Plaintiff,

v.

YOUNOW MEDIA, LLC,

Defendant.

C.A. No. 1:24-cv-05632

JURY TRIAL DEMANDED

PATENT CASE

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Virtual Creative Artists, LLC and Defendant YouNow Media, LLC ("the parties") submit this Joint Motion to Stay All Deadlines and Notice of Settlement pending finalization of settlement. The parties have reached an agreement in principle to settle the case between them and are in the process of drafting a written settlement agreement. The parties wish to conclude the settlement without burdening the Court with a hearing and any additional filings, and without incurring unnecessary expense. The parties believe that a settlement agreement can be finalized and executed on or before January 6, 2025.

Accordingly, the parties respectfully request that the Court grant a 32-day stay of proceedings between them, including all deadlines, until January 6, 2025. The parties submit that good cause exists for granting this agreed motion, as set forth above, and that this motion is not filed for purposes of delay.

A suggestion of settlement having been made, this case is dismissed. If the settlement is not consummated within 30 days of this order, or an authorized enlarged date, either party may apply by letter for restoration of the action within 10 days after the close of said period. All pending court dates are cancelled. The Clerk is directed to close the case.

Alvin K. Hellerstein, U.S.D.J.

Date

December 5, 2024

OF COUNSEL:
David R. Bennett
(admitted pro hac vice)
Direction IP Law
P.O. Box 14184
Chicago, IL 60614-0184
(312) 291-1667
dbennett@directionip.com

LOAKNAUTH LAW, P.C.

/s/ Nicholas Loaknauth
Nicholas Loaknauth
Loaknauth Law, P.C.
1460 Broadway
New York, NY 10036
(212) 641-0745
nick@loaknauthlaw.com

Attorneys for Plaintiff Virtual Creative Artists LLC